

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT POOLEY,

Defendant.

CASE NO. 2:21-CR-111 WBS

DECLARATION OF KATHERINE T. LYDON

I, Assistant United States Attorney Katherine T. Lydon, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. Attached hereto as Exhibit 1 are the Evidence Custody Documents (also referred to as “evidence tags”) reflecting the physical items seized during the Parachute Center search warrant execution, bearing Bates-stamps POOLEY_221106-POOLEY_22123.
2. Attached hereto as Exhibit 2 are photos of Bill Dause’s computer taken by the DOT-OIG Computer Crimes Unit, bearing Bates-stamps POOLEY_1823-POOLEY_1829 and the contents of Pooley’s locker, bearing Bates-stamps POOLEY_1830-POOLEY_1832.
3. Attached hereto as Exhibit 3 are a selection of photos taken in the execution of the search warrant, with some marked with red circles to note the location of Bill Dause’s computer with serial number Z3TQT24TJ.
4. Attached hereto as Exhibit 4 is the Declaration of Frederick E. Cooper, V.
5. Attached hereto as Exhibit 5 are a selection of emails seized from Bill Dause’s computer in which Kathy Dause corresponded with and about potential Tandem Instructor candidates, and accompanying metadata.
6. Attached hereto as Exhibit 6 is an index I prepared of the physical evidence seized from the Parachute Center locker used by Robert Pooley.
7. Attached hereto as Exhibit 7 is an excerpt of the USPA Instructional Rating Manual, 2016-

2017 Edition, Instructor Examiner Administrative Responsibilities section.

8. Attached hereto as Exhibit 8 is an excerpt from the UPT Tandem Examiner Guide Lines for the Certification of Tandem Instructors with the Tandem Vector/Sigma System, Eleventh Edition-January 2013.

9. Attached hereto as Exhibit 9 is the Declaration of Charles Wilkerson.

Dated: February 20, 2024

By: /s/ Katherine T. Lydon
Katherine T. Lydon
Assistant United States Attorney